

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>In Re:</b>	<b>Case No.: 24-70418-JAD</b>
<b>POTTSVILLE OPERATIONS, LLC, <i>et al.</i>,<sup>1</sup></b>	<b>Chapter 11</b>
<b>Debtors.</b>	<b><i>Jointly Administered</i></b>
	<b>Doc. No.:</b>
<b>POTTSVILLE OPERATIONS, LLC, <i>et al.</i>,</b>	<b>Related to Document Nos.: See Below</b>
<b>Movants,</b>	<b>Hearing Date: April 22, 2025</b>
<b>-vs -</b>	<b>Hearing Time: 2:00 PM (EST)</b>
<b>NO RESPONDENTS.</b>	<b>Response Deadlines: See Below</b>

**NOTICE OF PRELIMINARY AGENDA FOR MATTERS  
SCHEDULED FOR HEARING ON APRIL 22, 2025, AT 2:00 PM (EST)**

**I. RESOLVED MATTERS**

1. First Interim Application of Baker & Hostetler, LLP for Payment of Compensation and Reimbursement of Expenses for the Period of October 15, 2024, through January 31, 2025 [Doc. No. 753] filed on March 3, 2025

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<sup>1</sup>The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: Pottsville Operations, LLC (9467); Pottsville Propco, LLC (8685); Hampton House Operations, LLC (8969); Hampton House Propco, LLC (7258); Kingston Operations, LLC (1787); Kingston Propco, LLC (8562); Williamsport North Operations, LLC (9927); Williamsport Propco, LLC (2039); Williamsport South Operations, LLC (0298); Yeadon Operations, LLC (9296); and Yeadon Propco, LLC (5785) (collectively, the "Pottsville Debtors") and the Pottsville Debtors' chapter 11 cases are collectively referred to as the "Pottsville Cases") and Bedrock Care, LLC (9115); Care Pavilion Operating, LLC (7149); Cliveden Operating, LLC (6546); MAPA Operating, LLC (3750); Maplewood Operating, LLC (0850); Milton Operating, LLC (5523); Parkhouse Operating, LLC (0140); Tucker Operating, LLC (4305); Watson town Operating, LLC (0236); and York Operating, LLC (2571) (collectively the "Care Pavilion Debtors" and the Care Pavilion Debtors' chapter 11 cases are collectively referred to as the "Care Pavilion Cases"). The Debtors' mailing address is 425 West New England Avenue, Suite 300, Winter Park, Florida 32789.

Objection/Response Deadline:

- a. 4:00 PM (EST) on March 17, 2025

Objections/Responses Filed:

- a. None

Related Documents:

- a. Notice of Hearing and Objection Deadline on First Interim Fee Application of Baker & Hostetler, LLP, for Payment of Compensation and Reimbursement of Expenses for the Period of October 15, 2024, through January 31, 2025 [Doc. No. 756] filed on March 3, 2025
- b. Certificate of Service [Doc. No. 765] filed March 5, 2025
- c. Certificate of No Objection [Doc. No. 820] filed March 18, 2025
- d. Default Order [Doc. No. 903] entered April 3, 2025

Status: The Court granted the relief requested in this matter by default. No hearing is necessary on this matter.

- 2. First Interim Fee Application of Raines Feldman Littrell, LLP, for Payment of Compensation and Reimbursement of Expenses for the Period of October 15, 2024, through January 31, 2025 [Doc. No. 762] filed on March 4, 2025

Objection/Response Deadline:

- a. 4:00 PM (EST) on March 17, 2025

Objections/Responses Filed:

- a. None

Related Documents:

- a. Notice of Hearing and Objection Deadline on First Interim Fee Application of Raines Feldman Littrell, LLP, for Payment of Compensation and Reimbursement of Expenses for the Period of October 15, 2024, through January 31, 2025 [Doc. No. 763] filed on March 4, 2025
- b. Certificate of Service [Doc. No. 765] filed March 5, 2025

- c. Certificate of No Objection [Doc. No. 822] filed March 19, 2025
- d. Default Order [Doc. No. 904] entered April 3, 2025

Status: The Court granted the relief requested in this matter by default. No hearing is necessary on this matter

- 3. Care Pavilion Debtors' Motion for an Order Extending the Deadline for Debtors to Assume or Reject Unexpired Leases [Doc. No. 809] filed March 14, 2025

Objection/Response Deadline:

- a. 4:00 PM (EST) on April 10, 2025

Objections/Responses Filed:

- a. None

Related Documents:

- a. Certificate of Service [Doc. No. 819] filed March 17, 2025
- b. Amended Notice of Hearing and Objection Deadline [Doc. No. 862] filed March 25, 2025
- c. Certificate of No Objection [Doc. No. 948] filed April 14, 2025
- d. Default Order [Doc. No. 951] entered April 15, 2025

Status: The Court granted the relief requested in this matter by default. No hearing is necessary on this matter

**II. MATTERS SUBMITTED UNDER CERTIFICATE OF NO OBJECTION**

- 1. First Interim Application for Compensation and Reimbursement of Expenses of Dentons as Counsel to the Official Committee of Unsecured Creditors for the Period of October 29, 2024, through January 31, 2025 [Doc. No. 805] filed March 13, 2025

Objection/Response Deadline:

- a. 4:00 PM (EST) on March 27, 2025

Objections/Responses Filed:

- a. None

Related Documents:

- a. Notice of Hearing and Objection Deadline on First Interim Application for Compensation and Reimbursement of Expenses of Dentons as Counsel to the Official Committee of Unsecured Creditors [Doc. No. 818] filed March 17, 2025
- b. Certificate of No Objection [Doc. No. 871] filed March 28, 2025

Status: The Committee has filed a certificate of no objection relating to this matter. The Debtors believe that a hearing is only necessary if this Court does not enter a default order granting the relief requested in this matter.

**III. MATTERS GOING FORWARD**

- 4. Motion of Claim Watcher, LLC to (I) Compel Assumption or Rejection of Executory Contract and (II) Compel Payment of Administrative Claim [Doc. No. 417]

Objection / Response Deadline:

- a. January 9, 2025 at 4:00 p.m. (EST)

Objections / Responses Filed:

- a. Debtors' Response to Motion of Claim Watcher, LLC to (I) Compel Assumption or Rejection of Executory Contract and (II) Compel Payment of Administrative Claim [Doc. No. 517] filed January 9, 2025

Related Documents:

- a. Notice of Hearing with Response Deadline [Doc. No. 418] filed December 17, 2025
- b. Certificate of Service [Doc. No. 421] filed December 17, 2025
- c. Text Order Rescheduling Hearing [Doc. No. 558] entered on January 15, 2025
- d. Text Order Rescheduling Hearing [Doc. No. 645] entered on February 6, 2025
- e. Text Order Rescheduling Hearing [Doc. No. 694] entered on February 17, 2025
- f. Stipulation Continuing Hearing Currently Scheduled for Thursday, March 13, 2025 [Doc. No. 786] filed March 11, 2025

g. Certificate of Service [Doc. No. 801] filed March 12, 2025

h. Text Order Rescheduling Hearing [Doc. No. 916] entered April 7, 2025

Status: The Debtors have filed a response in opposition to the relief requested in this matter. The Debtors are continuing to negotiate with the movant and anticipate this matter will be resolved in advance of the hearing. If the Debtors are unable to amicably resolve this matter in advance of the hearing, the Debtors propose that this matter go forward as a further preliminary hearing.

5. Motion of Yvonne Watson, Individually and as Executrix of the Estate of Mary E. Coles for Entry of an Order Granting (I) Relief from the Automatic Stay and (II) Related Relief [Doc. No. 650] filed on February 11, 2025

Objection / Response Deadline:

- a. February 28, 2025

Objections / Responses Filed:

- a. Debtors' Objection and Reservation of Rights to Motion of Yvonne Wayson, Individually and as Executrix of the Estate of Mary E. Coles for Entry of an Order Granting (I) Relief from Stay and (II) Related Relief [Doc. No. 745] filed February 28, 2025

Related Documents:

- a. Notice of Hybrid Hearing with Response Deadline Regarding Motion of Yvonne Watson, Individually and as Executrix of the Estate of Mary E. Coles for Entry of an Order Granting (I) Relief from Stay and (II) Related Relief [Doc. No. 652] filed on February 11, 2025
- b. Certificate of Service [Doc. No. 653] filed February 11, 2025
- c. Text Order Rescheduling Hearing [Doc. No. 785] entered March 11, 2025
- d. Text Order Rescheduling Hearing [Doc. No. 916] entered April 7, 2025

Status: The Debtors and Movant are continuing to discuss and negotiate a potential resolution on this Motion and anticipate this matter will be resolved before the hearing. If not resolved, the Debtors intend to move forward with their objection or request a continued hearing on the motion.

6. Care Pavilion Debtors' Motion for an Order Extending the Exclusive Periods to File a Chapter 11 Plan and to Solicit Acceptances Thereof [Doc. No. 808] filed March 14, 2025

Objection/Response Deadline:

- a. 4:00 PM (EST) on April 10, 2025  
April 17, 2025 (Committee Only)

Objections/Responses Filed:

- a. None as of the filing of this Preliminary Agenda

Related Documents:

- a. Certificate of Service [Doc. No. 819] filed March 17, 2025
- b. Amended Notice of Hearing and Objection Deadline [Doc. No. 862] filed March 25, 2025
- c. Stipulation and Consent Order Extending Deadline for the Official Committee of Unsecured Creditors to Respond to the Care Pavilion Debtors' Motion for an Order Extending the Exclusive Periods to File a Chapter 11 Plan and to Solicit Acceptances Thereof [Doc. No. 919] filed April 10, 2025
- d. Default Order Extending Committee Response Deadline [Doc. No. 934] entered April 11, 2025
- e. Text Order Rescheduling Hearing [Doc. No. 916] entered April 7, 2025

Status: The Court extended the deadline for the Committee to respond to this matter to and through April 17, 2025. If no objection is filed, the Debtors will file a certificate of no objection requesting the entry of an order granting the relief requested in this matter. If an objection is filed prior to the Committee's extended deadline, this matter is going forward.

- 7. Omnibus Motion of Migdalla Rivera, Administrator *Ad Prosequendum* of the Estate of German Rivera-Perez, Deceased; Andrea Barnes, Executrix of the Estate of Percy Hutchings, Deceased; Davida Floyd, Administrator of the Estate of Belinda M. Floyd, Deceased; and Veronica Saunders, Administratrix of the Estate of Veora Saunders, Deceased, for Entry of an Order Granting (I) Relief from the Automatic Stay and (II) Related Relief [Doc. No. 850] filed March 21, 2025

Objection/Response Deadline:

- a. 4:00 PM (EST) on April 9, 2025  
April 16, 2025 (Debtors Only)

Objections/Responses Filed:

- a. Debtors' Reservation of Rights with Respect to Motions for Relief from the Automatic Stay [Doc. No. 918] filed April 9, 2025
- b. Debtors' Omnibus Objection to Motions for Relief from the Automatic Stay [Doc. No. 955] filed April 16, 2025

Related Documents:

- a. Notice of Zoom Hearing with Response Deadline Regarding Omnibus Motion to Lift Stay of Settled Cases [Doc. No. 852] filed March 21, 2025
- b. Text Order Rescheduling Hearing [Doc. No. 916] entered April 7, 2025

Status: The Debtors have filed a reservation of rights and objection with respect to the relief requested in this Motion. The Debtors continue to negotiate a potential resolution with the Movants and anticipate this matter will be resolved before the hearing. If not resolved, the Debtors intend to move forward with their objection or request a continued hearing date to continue discussions.

- 8. Motion of Frank A. Crew, Administrator of the Estate of Jeremiah Crew for Entry of an Order Granting (I) Relief from the Automatic Stay and (II) Related Relief [Doc. No. 853] filed March 21, 2025

Objection/Response Deadline:

- a. 4:00 PM (EST) on April 9, 2025  
April 16, 2025 (Debtors Only)

Objections/Responses Filed:

- a. Debtors' Reservation of Rights with Respect to Motions for Relief from the Automatic Stay [Doc. No. 918] filed April 9, 2025
- b. Debtors' Omnibus Objection to Motions for Relief from the Automatic Stay [Doc. No. 955] filed April 16, 2025

Related Documents:

- a. Notice of Zoom Hearing with Response Deadline Regarding Omnibus Motion to Lift Stay of Settled Cases [Doc. No. 855] filed March 21, 2025
- b. Text Order Rescheduling Hearing [Doc. No. 916] entered April 7, 2025

Status: The Debtors have filed a reservation of rights and objection with respect to the relief requested in this Motion. The Debtors continue to negotiate a potential resolution with the Movants and anticipate this matter will be resolved before the hearing. If not

resolved, the Debtors intend to move forward with their objection or request a continued hearing date to continue discussions.

9. Motion of Paulette Midgette, Administratrix of the Estate of Ida Mae Midgette for Entry of an Order Granting (I) Relief from the Automatic Stay and (II) Related Relief [Doc. No. 856] filed March 21, 2025

Objection/Response Deadline:

- a. 4:00 PM (EST) on April 9, 2025  
April 16, 2025 (Debtors Only)

Objections/Responses Filed:

- a. Debtors' Reservation of Rights with Respect to Motions for Relief from the Automatic Stay [Doc. No. 918] filed April 9, 2025
- b. Debtors' Omnibus Objection to Motions for Relief from the Automatic Stay [Doc. No. 955] filed April 16, 2025

Related Documents:

- a. Notice of Zoom Hearing with Response Deadline Regarding Omnibus Motion to Lift Stay of Settled Cases [Doc. No. 858] filed March 21, 2025
- b. Text Order Rescheduling Hearing [Doc. No. 916] entered April 7, 2025

Status: The Debtors have filed a reservation of rights and objection with respect to the relief requested in this Motion. The Debtors continue to negotiate a potential resolution with the Movants and anticipate this matter will be resolved before the hearing. If not resolved, the Debtors intend to move forward with their objection or request a continued hearing date to continue discussions.

10. Status Conference Regarding (i) Objection and Reservation of Rights to the Care Pavilion Debtors' Notice of Executory Contracts That May Be Assumed and Assigned filed by Local 262, Retail, Wholesale and Department Store Union, United Food and Commercial Workers, Retail, Wholesale and Department Store Union, United Food and Commercial Workers [Doc. No. 631] filed on January 31, 2025; and (ii) Objection and Reservation of Rights to the Care Pavilion Debtors' Notice of Executory Contracts That May Be Assumed and Assigned filed by Local 262, Retail, Wholesale and Department Store Union, United Food and Commercial Workers, Retail, Wholesale and Department Store Union, United Food and Commercial Workers [Doc. No. 633] filed on January 31, 2025

Status: By Text Order entered at Doc. No. 902, based on the colloquy on the record at the hearing held on April 3, 2025, on the Care Pavilion Debtors' Sale Motion [Doc. No. 357], the Court schedule a status conference for April 22, 2025, to the extent the



Debtors and Local 262, Retail, Wholesale and Department Store Union, United Food and Commercial Workers, Retail, Wholesale and Department Store Union, United Food and Commercial Workers (“Local 262”) were unable to resolve the objections [Doc. No. 631 and 633] filed by Local 262 at the settlement conferences conducted the week of April 8, 2025. There are ongoing negotiations related to these objections and drafting related to such negotiations. It is anticipated these negotiations will be complete prior to the hearing.

#### **IV. ADDITIONAL INFORMATION**

All documents filed in these Chapter 11 Cases may be reviewed, free of charge, on the website created by Stretto, Inc., the Claims and Noticing Agent for these Chapter 11 Cases, at <https://cases.stretto.com/pottsville>. Inquiries may be directed by telephone to 855-469-1264 (for U.S. & Canada calls) and 714-586-5713 (for calls originating outside of the U.S.) or by email to [PottsvilleInquiries@stretto.com](mailto:PottsvilleInquiries@stretto.com).

Dated: April 17, 2025  
Pittsburgh, Pennsylvania

Respectfully submitted:

**RAINES FELDMAN LITTRELL, LLP**

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- and -

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